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United States Bankruptcy Court
Eastern District of Pennsylvania

In re:

Michael Melendez,
Phyllis Melendez,

Debtors.

Case No. 18-17608-AMC

Chapter 13

Debtors' Motion to Modify Chapter 13 Plan


AND NOW, Debtors Michael Melendez and Phyllis Melendez, by and through their attorney, move this Court for approval of a modified chapter 13 plan. In support of this motion, the Debtors state as follows:

1. The Debtors filed this case under chapter 13 on November 15, 2018.
2. The trustee in this case is Kenneth E. West.
3. The plan was confirmed on January 29, 2020.
4. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
5. The Debtors want to amend their plan to resolve the dismissal motion.
6. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward.
7. The Debtors request that the Court enter an order approving the plan filed at ECF No. 118 as the new confirmed plan.
8. The Debtor will soon file a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

NOW, THEREFORE, the Debtors ask this Court to approve the modified plan and to grant such other relief in their favor as may be necessary and proper under the law.

Date: December 11, 2024

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